

*Diva*UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80232-MARRA-JOHNSON

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

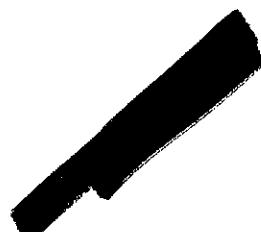
PLAINTIFF JANE DOE 3'S ANSWERS TO DEFENDANT'S FIRST
INTERROGATORIES

Plaintiff, JANE DOE 3, by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 33, hereby responds to Defendant, JEFFREY EPSTEIN'S First Set of Interrogatories to Plaintiff as follows:

General Objections

1. Plaintiff objects to Defendant's Interrogatories to the extent that the Interrogatories call for the disclosure of information protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privilege or immunity, whether created by statute or common law. Plaintiff claims such privileges and protections to the extent implicated by each Interrogatory, and excludes privileged and protected information from any responses to Defendant's discovery. Any disclosure is inadvertent and is not intended to waive those privileges or protections, which are specifically reserved.

2. Plaintiff objects to Defendant's Interrogatories to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.



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No.

9. Describe each injury (physical, emotional, mental) for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury, and as to any injuries you contend are permanent, the effects on you that you claim are permanent.

Answer:

Plaintiff has suffered severe psychological, emotional and psychical injuries, including without limitation, anxiety, depression, suicidal ideation, guilt, self-blame, feelings of being degraded, feeling unattractive, diminished sense of femininity, fluctuations in weight/appetite, sexual/intimacy problems, flashbacks, disturbing memories, stress, irritability, feelings of being isolated and trapped, diminished trust, social problems, problems in personal relationships, indecisiveness, lower energy, lower ambition and initiative, headaches, back pain, feels stress (particularly around men), obsessive thoughts, problems concentrating, alcohol abuse, corruption of morals and values, loss of innocence, and cries a lot.

Plaintiff's psychological and emotional injuries will be analyzed and explained by a forensic expert, whose opinions and related information will be disclosed in accordance with the expert discovery rules of the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement this response in accordance with the Federal Rules of Civil Procedure.

10. Please state each item of damage that you claim, and include in your answer: the count to which the item of damages relates; the factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used.

Answer:

Plaintiff objects to this interrogatory as calling for an expert opinion and calculation. Subject to said objection, Plaintiff states that she seeks damages arising from her psychological and emotional injuries. These damages include pain and suffering, costs of psychological care and treatment, and loss of earning capacity. The pecuniary elements of these damages will be analyzed and computed by an appropriate expert.

Discovery is ongoing and will be supplemented in accordance with the Federal Rules of Civil Procedure.

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Plaintiff was paid \$100 for bringing [REDACTED]

24. Please list each time you were interviewed by any state or federal law enforcement agent or prosecutor, who was present, whether notes were taken, and what you recall saying to them.

Answer:

See Plaintiff's Answer to Interrogatory No. 22.

25. Please describe any statements made to you by any federal or state law enforcement agent or prosecutor regarding the availability of civil remedies against Mr. Epstein and regarding whether there would be any benefit from your voluntary cooperation with law enforcement.

Answer:

Plaintiff received correspondence in July and September, 2008, from A.U.S.A. A. [REDACTED] in care of the undersigned attorney. No statements were ever made that her cooperation in the criminal case would benefit a civil claim.

January 26, 2009

Respectfully submitted:

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VERIFICATION

[REDACTED] being duly sworn, deposes and says that the foregoing answers to interrogatories are true and correct to the best of her knowledge, information and belief.

[REDACTED]

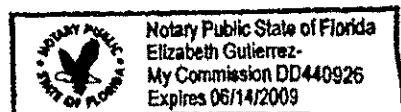
STATE OF FLORIDA)
)
) ss
COUNTY OF PALM BEACH)

[REDACTED] SORN TO AND SUBSCRIBED before me this 19 day of January, 2009 by [REDACTED], who is personally known to me or has produced the following identification Drivers license which is current or has been issued within the past five years and bears a serial or other identifying number.

Elizabeth Gutierrez
Print Name

Elizabeth Gutierrez
Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number:
My commission expires:
(Notarial Seal)



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Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 26 day of January, 2009.

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